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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

ORIGINAL

In the Matter of)

Amendment of Section 73.202(b),)

Table of Allotments,)

FM Broadcast Stations)

(Saluda and Irmo, South Carolina))

MM Docket No. _____

RM- _____

To: Chief, Allocations Branch, Mass Media Bureau

PETITION FOR RULEMAKING

Breckenridge Communications, LLC ("BC"), licensee of Station WJES-FM, Channel 221A, Saluda, South Carolina, herein petitions to (a) reallot Channel 221A from Saluda, South Carolina, to Irmo, South Carolina, (b) substitute Channel 221C3 for Channel 221A at Irmo and (c) modify the WJES-FM license to specify operation on Channel 221C3 at Irmo. In support of this petition, the following is stated:

A. Background

BC's proposal would result in a significant improvement in the facilities of WJES-FM and greater service to the public. Irmo, an incorporated community with a population of 11,039,¹ would

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¹ All population figures, unless otherwise noted, are from the 2000 Census.

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receive its first local broadcast service. Saluda, an incorporated community with a population of 3,066, would still have WJES(AM)² as a local transmission service.

In order for an existing FM station to change its community of license without affording other interested parties an opportunity to file competing expression of interest, the proposed channel must be mutually exclusive with the existing channel. *Modification of FM and TV Authorizations to Specify a New Community of License ("Community of License")*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990). Moreover, the new community must be preferred over the existing community under the Commission's allotment priorities. *Id.*

The attached Engineering Exhibit prepared by William Culpepper & Associates (Exhibit A) demonstrates the proposed allotment of Channel 221C3 at Irmo is mutually exclusive with the current WJES-FM allotment at Saluda.³

² WJES(AM) previously was licensed to Johnston, South Carolina. A construction permit application for a major modification of WJES to change, *inter alia*, the station's community of license to Saluda was granted October 5, 2001 (BMJP-20000127AB1). The modified facilities of WJES(AM) have been constructed and the station is operating as a Saluda station pursuant to automatic test authority. An application for license to cover the construction permit is pending.

³ The Engineering Exhibit uses the coordinates 34-09-00 NL and 81-13-00 WL as the proposed reference point. The proposed Irmo allotment is made possible by the change in frequency of Station WWBD, Bamberg, South Carolina, from Channel 221A to Channel 239A, pursuant to the *Report and Order in MM Docket No. 94-40*, 9 FCC Rcd 5816 (Acting Chief, Allocations Branch 1994). Station WWBD has been operating on Channel 239A since the summer of 1997 in line with its construction permit (BPH-19950512IC). The station's license application specifying Channel 239A (BLH-19970811KC) was granted July 20, 2001.

B. Adoption of BC's Proposal Would Result in a Preferential Arrangement of Allotments

Under proposed arrangement, Irmo, a much larger community, will receive its first local service, while Saluda, with the relocation of WJES(AM), will not lose local service. The proposed Irmo allotment, therefore, will serve Priority 3, as outlined in *Revision of FM Assignment Policies and Procedures*, 10 FCC 2d 88 (1982). In contrast, retention of WJES-FM at Saluda would serve only Priority 4.⁴ As set forth in Figure 2 of the attached Engineering Statement, the present 60 dbu contour of WJES-FM encompasses an area of 2,463 sq. km. with a population of 40,082. The proposed new facility will encompass an area of 4,778 sq. km. with a population of 544,383.⁵ Thus, if BC's proposal is adopted, the area served by WJES-FM would increase 93%; the population would increase 1358%. The area within the present WJES-FM 60 dbu contour will continue to be

⁴ Station WJES(AM) operates as a daytime only station. Commission precedent, however, confirms that a daytime-only station properly is deemed a local transmission service under the Commission's allotment priorities. *E.g., Greenville and Cooper, Texas*, DA 02-243, ¶ 5 (Chief, Allocations Branch, February 1, 2002); *Willows, California*, 15 FCC Rcd 23852 (Chief, Allocations Branch 2000); *Johnstown, New York*, 13 FCC Rcd 4702 (Chief, Allocations Branch 1998); *Ravenswood, West Virginia*, 10 FCC Rcd 3181 (Chief, Allocations Branch 1995); *Scotland Neck, North Carolina*, 7 FCC Rcd 5113 (Chief, Allocations Branch 1992), *recon. denied*, 10 FCC Rcd 11,066 (1995). These cases also confirm that providing a community (such as Irmo) with its first local service is favored over retention of the only local nighttime service in the original community, if the original community will retain a local daytime service.

⁵ The 60 dBu contour of the proposed facility will overlap an area of 358 square kilometers, with a population of 7,120 persons, within the current WJES-FM 60 dBu contour. *See* Exhibit A, Figure 2. That means an area of 2,095 square kilometers, with a population 32,962, presently within the WJES-FM 60 dBu contour would no longer receive primary service from the station. On balance, the loss of service is more than offset by the fact 537,263 persons in a 4,420 square kilometer area will gain service from WJES-FM. *See, e.g., Woodville and Wells, Texas*, 16 FCC Rcd 3067 (Chief, Allocations Branch 2001).

well-served. The attached Engineering Exhibit confirms that a minimum of six commercial FM services would remain available.⁶

Irmo is located in the far northwest portion of the Columbia, South Carolina Urbanized Area. Only 35% of the Urbanized Area would be within the 70 dbu contour of WJES-FM operating from the proposed reference point.⁷ See Exhibit A, p. 1 & Figure 3. Nonetheless, given the Commission's concern with the potential migration of stations from under-served rural areas to well-served urban areas, BC herein demonstrates, using the familiar *Tuck* criteria,⁸ that Irmo is an independent community, well-deserving of its first local broadcast service.

C. A *Tuck* Analysis Supports Adoption of BC's Proposal

Under *Tuck*, the Commission considers (a) the degree to which the station would provide coverage not only to the designated community of license but to the nearby metropolis; (b) the size and proximity of the designated community vis-a-vis the central city and (c) the degree to which the proposed community is independent from the central city.

⁶ Because the area clearly is well served, a study to determine the number of AM and noncommercial FM stations providing service was not conducted.

⁷ See *Hunstville, Texas*, DA 01-2627, ¶ 5 (Chief, Allocations Branch, November 9, 2001) (where city-grade contour of relocated station would cover only 17% of urbanized area, *Tuck* showing not necessary even though proposed community of license is located within urbanized area).

⁸ *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988).

With respect to the first factor, as noted previously, the station's 70 dbu contour would encompass only 35% of the Columbia, South Carolina Urbanized Area from the reference point proposed. The Commission on numerous occasions has approved reallocation proposals involving substantially greater 70 dbu coverage of a nearby urbanized area. *E.g., Anniston, Alabama*, 16 FCC Rcd 3411 (Chief, Allocations Branch 2001) (45% of urbanized area); *recon. denied*, 2001 FCC Lexis 6065 (Comm., released November 8, 2001) *Oraibi, Arizona*, 14 FCC Rcd 13547 (Chief, Allocations Branch 1999) (90% of urbanized area); *Mullins, South Carolina*, 14 FCC Rcd 10516 (Chief, Allocations Branch 1999) (67% of urbanized area).

With respect to the second factor, Irmo's population (11,039) is 9.5% of the population of the central city, Columbia (116,278). This percentage is larger than that approved in other cases. *E.g., Anniston, Alabama, supra* (5.1%); *Ada, Oklahoma*, 11 FCC Rcd 16869 (Chief, Allocations Branch 1996) (0.9%); *Scotland Neck, North Carolina*, 10 FCC Rcd 11066 (Chief, Allocations Branch 1995) (3.1%). Furthermore, the community reference point for Irmo is more than 10 miles from the community reference point for Columbia. *See* Exhibit B.

With respect to the third factor, the information BC presents herein clearly demonstrates Irmo's status as an independent community. In considering whether an outlying community is independent of a central city in the vicinity, the Commission considers eight sub-factors:

1. the extent to which community residents work in the larger metropolitan area, rather than the specified community;

6.

2. whether the smaller community has its own newspaper or other media that cover the community's local needs and interests;
3. whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area;
4. whether the specified community has its own local government and elected officials;
5. whether the smaller community has its own zip code and/or telephone book provided by the local telephone company;
6. whether the community has its own commercial establishments, health facilities, and transportation systems;
7. the extent to which the specified community and the central city are part of the same advertising market; and
8. the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools and libraries.

The Commission considers a community independent when a majority of these factors demonstrate that the community is distinct from the urbanized area. *Parker and St. Joe, Florida*, 11 FCC Rcd 1095 (Chief, Allocations Branch 1996); *Jupiter and Hobe Sound, Florida*, 12 FCC Rcd 3570 (Chief, Allocations Branch 1997). Here, nearly all of these factors demonstrate Irmo's independence from Columbia.

1. Abundant Employment Opportunities are Available in Irmo.

The Greater Irmo Chamber of Commerce boasts more than 300 members. *See* Exhibit C. Dozens upon dozens of businesses are located in Irmo. *See, e.g.*, Exhibits N and O. Among the major employers is a large fiber plant operated by Honeywell. The plant, formerly owned by Allied Fibers, has been located in Irmo for 35 years and employs more than 1,400 persons. *See* Exhibit D, p. 3.

1990 Census Bureau data regarding Irmo indicated that of the community's 6,326 workers age 16 years and above, 3,043 (48.1%) worked in the Columbia Metropolitan Statistical Area,⁹ but not in the central city of Columbia. *See* Exhibit E, p. 2. Another 459 persons (7.3%) worked outside any Metropolitan Statistical Area (254 persons) or in another MSA (205 persons). Thus, less than half of the residents of Irmo worked in Columbia.¹⁰

⁹ The Columbia Metropolitan Statistical Area consists of Lexington County and Richland County, South Carolina.

¹⁰ Parallel data from the 2000 Census is scheduled to be released later this year.

2. **Irmo Has its Own Newspaper and Other Media Outlets.**

The New Irmo News, a weekly newspaper, serves Irmo. The newspaper carries Irmo news of local events and advertising for Irmo businesses. See Exhibit F. *The New Irmo News* also publishes *The Lake Murray News*, which includes news of the area and advertising for businesses in Irmo and nearby small communities. *Id.* *The State*, Columbia's daily newspaper, also publishes a weekly section regarding Irmo and other nearby communities. See Exhibit G.

Additionally, several Internet web sites regarding Irmo are available, including sites operated by the Irmo Chamber of Commerce and the municipal government. A sampling of the Irmo web sites includes: www.townofirmo.com; www.irmochamber.com; www.irmookrastrut.com; www.geocities.com/capitolhill/1171/irmo.html; www.southcarolina-info.com/city/irmo.html; and www.vismor.net/irmo.htm. Indeed, the Irmo Band Booster Association, a parent group organized to support the activities of the Irmo High School band and auxiliary dance team, maintains a website, www.irmoband.org. See Exhibit V.

3. **Irmo's Residents Consider Their Long-Established Community to be Separate from Columbia**

Irmo has a long history and a well-established identity separate from that of Columbia. On Christmas Eve of 1890, the Town of Irmo was created. The town was officially chartered in response to the anticipated opening of the Columbia, Newberry and Laurens Railroad. The name Irmo was formed from the names of two railroad men responsible for the venture – Captain C. J.

Iredell and Henry C. Mosley. See Exhibit H (excerpt from a Greater Irmo Chamber of Commerce brochure).

The community takes great pride in its history. In connection with the centennial celebration of Irmo's founding, the Town of Irmo and the local newspaper (then *The Independent News*) published a 199-page hard cover book titled *Irmo and the Dutch Fork Legacy, a Centennial Celebration*. Exhibit I.¹¹

Irmo's status as a community separate from Columbia is highlighted by the vigorous efforts of Greater Irmo Chamber of Commerce to promote the community. Among several other functions, the Chamber operates a tourist/information center and produces brochures and leaflets regarding Irmo's attributes and culture. See Exhibit J. As previously noted, the Chamber also maintains a website to provide information regarding facilities and services available in Irmo.

One manifestation of Irmo's pride and independence is its annual celebration – the Okra Strut, which will celebrate its 29th year in 2002. Tens of thousands come to Irmo in the early fall for a weekend of live music, art and craft displays, and an okra eating contest. Attendance of the 1999 celebration was estimated to be 90,000. The Okra Strut is managed by a board of commissioners appointed by the Irmo Town Council. *See* Exhibit K.

¹¹Exhibit I consists of a short excerpt from the centennial publication. BC will be happy to provide additional excerpts upon request.

4. Irmo Has its Own Local Government and Elected Officials.

Irmo is governed by a five-member town council, consisting of the mayor and four councilmen. Each official serves a four-year term. Among other town officials are the Town Administrator, the Clerk/Treasurer, the Director of Public Services, the Clerk of the Court and officials handling business licensing, personnel and finance. See Exhibit L (excerpts from the Town of Irmo's web site).

5. Irmo Has its Own Zip Code.

Irmo has its own zip code, 29063. *See* Exhibit M (print-out from U.S. Postal Service website).

6. Irmo Has Numerous Commercial Establishments and Other Facilities.

A long list of businesses are located in Irmo. As noted above, the Greater Irmo Chamber of Commerce has more than 300 members. Indicative of Irmo's status as an independent community is the fact more than a score of businesses use Irmo in their names:

Azalea Room of Irmo
 Bicycle Center of Irmo
 Capri's of Irmo
 Discount Tire of Irmo
 Gibbons Quick Storage of Irmo
 Irmo Auto Supply
 Irmo Counseling Center
 Irmo Dialysis Clinic
 Irmo Electric Co.

Irmo Floral & Gifts, Inc.
 Irmo Furniture Company
 Irmo Insurance, Inc.
 Irmo Interiors
 Irmo Laundry & House Cleaning
 Irmo Limousine
 Irmo Lock Co.
 Irmo Outdoor Equipment
 Irmo Paint & Body Shop
 Irmo Pest Control
 Irmo Quality Plumbing
 Irmo Tire & Automotive, Inc.
 Irmo Village Apartments
 Irmo Vinyl Exteriors
 Kumon Center of Irmo
 Taekwondo Plus of Irmo
 The New Irmo News

See Exhibit N (excerpts from on-line business directories).

Listings from the Yahoo Yellow Pages give an indication of the large number of businesses located in Irmo. For instance, the Yahoo directory lists 13 automotive repair and service outlets in Irmo and at least six law offices. The Yahoo listings are not comprehensive but give an indication of the level of commercial activity in Irmo. See Exhibit O (excerpt for the Yahoo Yellow Pages).

Medical services are also available in Irmo. A branch of the Lexington Medical Center is located on St. Andrews Road in Irmo. It provides out-patient surgery, women's imaging services, urgent care services, x-ray and laboratory facilities. *See Exhibit P.* Also located in Irmo is a dialysis center. *See Exhibit N.* Additionally, the Yahoo Yellow Pages list 30 doctors, dentists and clinics located in Irmo. *See Exhibit Q.*

Irmo also is the home of many churches. See Exhibit R (Greater Irmo Area Church Directory, taken from *The New Irmo News*).

7. Businesses can Advertise Directly to Irmo Residents.

Businesses interested in advertising to the residents of Irmo can do so through *The New Irmo News* and *The Lake Murray News*, as well as via commercial web sites or through listings in, among others, the Greater Irmo Chamber of Commerce web site. Irmo advertisers also can reach the local population through *Lake Murray Magazine*, published in nearby Ballentine, South Carolina. *See* Exhibit S.

8. Irmo Provides Most of its Own Municipal Services.

Irmo provides its own police services. The Irmo Police Department operates 19 patrol vehicles and has 18 sworn personnel, including administrative staff, investigators, patrol officers, D.A.R.E. personnel and four reserve officers. See Exhibit L. Fire protection is provided by the Irmo Fire District, which uses a professional staff.

Irmo's schools are part of School District 5, serving Lexington and Richland Counties and headquartered in Ballentine, South Carolina. The District annually posts some of the highest test scores in South Carolina. Schools in Irmo include Dutch Fork Elementary, H.E. Corley Elementary, River Springs Elementary, Irmo Elementary, Dutch Fork Middle School and Dutch Fork High School. *See* Exhibit T (print-out from Greater Irmo Chamber of Commerce website).

The Lexington County Public Library System operates the Irmo Branch Library, a 25,000-square foot facility that serves an average of 850 customers a day. See Exhibit U.

C. Conclusion

The material presented herewith demonstrates that Irmo is a vibrant, independent community. The proposal to relocate WJES-FM to Irmo and upgrade the station's allotment from Class A to Class C3 status is in the public interest. The area to be served will more than double. The population to be served will increase more than twelve fold. The much larger community of Irmo will receive its first local broadcast service and, significantly, WJES-FM's present community of license, Saluda, will not be left without a local service. WJES(AM), which is under common control with WJES-FM, has relocated to Saluda. Moreover, area and population with the present WJES-FM primary contour will continue to be well served.

WHEREFORE, IN LIGHT OF ALL CIRCUMSTANCES PRESENT, It is respectfully requested that a Notice of Proposed Rulemaking be issued proposing that the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, be amended as follows:

<u>Community</u>	<u>Present Channel No.</u>	<u>Proposed Channel No.</u>
Irmo, SC	—	221C3
Saluda, SC	221A	—

Furthermore, the license of WJES-FM should be modified to specify operation on Channel 221C3 at Irmo, South Carolina.

BRECKENRIDGE COMMUNICATIONS, LLC

By: 

Matthew H. McCormick, Esquire
Its Counsel

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March 1, 2002

Exhibit A

Engineering Exhibit

**Prepared By:
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Charlotte, NC 28270**

BRECKENRIDGE COMMUNICATIONS, L.L.C.

IRMO, SOUTH CAROLINA

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BRECKENRIDGE COMMUNICATIONS, L.L.C.

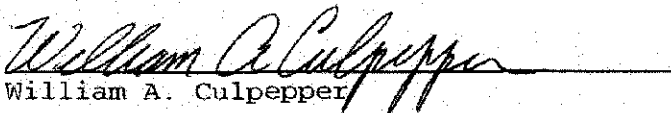
WJES-FM

IRMO, SOUTH CAROLINA

DECLARATION

I declare, under penalty of perjury, that I have prepared this exhibit for Breckenridge Communications, L.L.C., and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief; and that I am a Registered Professional Engineer in the State of North Carolina.

Executed on February 28, 2002.


William A. Culpepper

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BRECKENRIDGE COMMUNICATIONS, L.L.C.

IRMO, SOUTH CAROLINA

NARRATIVE

This exhibit has been prepared in support of a petition for rule making by Breckenridge Communications, L.L.C., licensee of WJES-FM, channel 221A, Saluda, South Carolina. The purpose of the petition is to change the channel from class A to class C3 and to re-assign the allotment to Irmo, South Carolina.

The reference point for the new facility is 34° 13' 00" north and 81° 13' 00" west, which is 7.84 kilometers at 337 degrees from Irmo. A class C3 facility at this point will meet the requirements of §73.315(a) regarding coverage of the principal community. The requirements of §73.207 can be met over a large area, providing reasonable assurance of an available transmitter site.

Irmo is an incorporated city in Richland and Lexington Counties, and it had a 2000 population of 11,039. Irmo currently has no broadcast assignment.

Figure 1 shows that the present WJES 60 dBu contour is covered by a minimum of six 60 dBu contours of commercial FM stations. All contours, including WJES, are for the maximum class contour distance of each station, assuming uniform terrain. The stations are identified on page 4.

Present and proposed populations and areas are shown on the contour map on Figure 2. Contours are based on maximum class contour distance, assuming uniform terrain. The overlap area was measured by planimeter. Populations were determined by computer program based on the 2000 census. The population inside the overlap area was determined by identifying census data centroids common to both present and proposed contours.

The Columbia, South Carolina Urbanized area consists of portions of Lexington and Richland Counties. Figure 3 shows the urbanized area and the 70 dBu coverage contour of a class C3 facility at the reference coordinates, using uniform terrain and an antenna HAAT of 100 meters. The 70 dBu contour encompasses 35 per cent of the Columbia urbanized area.

Allotment of channel 221C3 to Irmo will provide that community with a First Local Radio Service.

BRECKENRIDGE COMMUNICATIONS L.L.C.
IRMO SOUTH CAROLINA
CHANNEL STUDY
REFERENCE COORDINATES

REFERENCE

34 09 00 N
81 13 00 W

CLASS = C3

Current Spacings

DISPLAY DATES

DATA 02-23-02

SEARCH 02-26-02

----- Channel 221 - 92.1 MHz -----

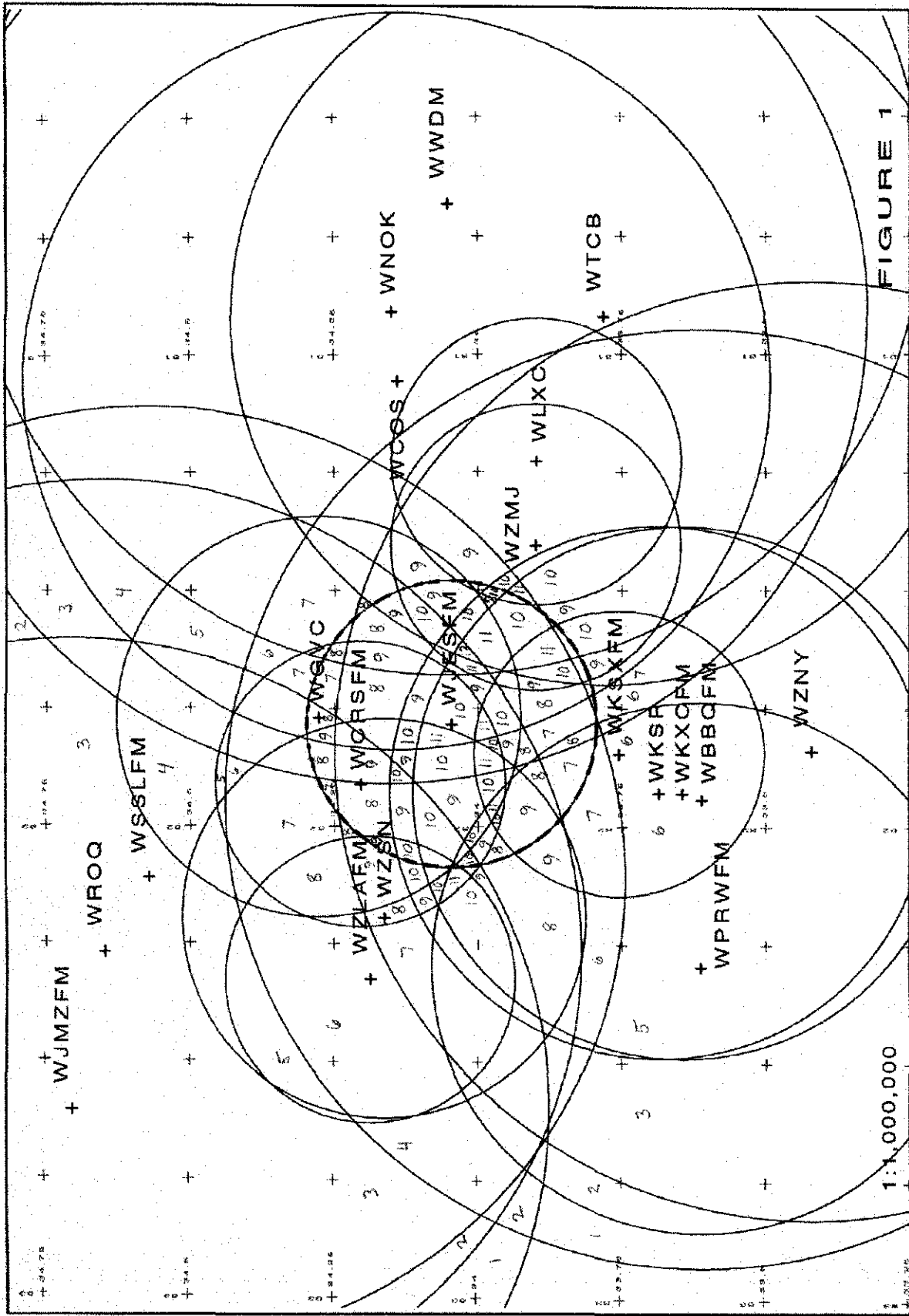
Call	Channel	Location		Dist	Azi	FCC	Margin
WJESFM APP 221A	Saluda	SC	43.12	253.6	142.0	-98.88	
WJESFM LIC 221A	Saluda	SC	53.56	257.7	142.0	-88.44	
WBHCFM CP 221A	Hampton	SC	145.11	176.6	142.0	3.11	
WBHCFM APP 221A	Hampton	SC	145.11	176.6	142.0	3.11	
WRCM LIC 220C3	Wingate	NC	112.61	26.2	99.0	13.61	
RDEL DEL 221A	Elberton	GA	157.87	265.6	142.0	15.87	
WWRKFM LIC 221A	Elberton	GA	157.87	265.6	142.0	15.87	
WAEG LIC 222A	Evans	GA	112.54	236.7	89.0	23.54	
WPEHFM LIC 221A	Louisville	GA	166.76	221.1	142.0	24.76	
WKSXFM LIC 224A	Johnston	SC	72.78	233.1	42.0	30.78	
WHLZ LIC 223C	Manning	SC	132.67	120.7	96.0	36.67	
RDEL DEL 223C	Manning	SC	132.67	120.7	96.0	36.67	
RADD ADD 223C	Moncks Corner	SC	132.67	120.7	96.0	36.67	
WPUBFM LIC 274A	Camden	SC	50.27	80.2	12.0	38.27	
WARA CP 218A	Laurens	SC	81.56	288.8	42.0	39.56	
WMNCFM LIC 221A	Morganton	NC	183.67	345.7	142.0	41.67	
WMYB LIC 221C2	Myrtle Beach	SC	219.79	101.9	177.0	42.79	
ALLO VAC 221A	Lavonia	GA	189.43	281.0	142.0	47.43	
WLPE LIC 219A	Augusta	GA	89.80	228.4	42.0	47.80	
WKRR LIC 222C	Asheboro	NC	225.39	33.5	176.0	49.39	
WLPE.A APP 219A	Augusta	GA	91.52	225.6	42.0	49.52	
WGZO LIC 221A	Parris Island	SC	206.81	163.6	142.0	64.81	
WIGL.C CP 275A	Orangeburg	SC	80.06	161.7	12.0	68.06	
WIGL LIC 275A	Orangeburg	SC	80.06	161.7	12.0	68.06	
WAJY LIC 274A	New Ellenton	SC	80.55	208.7	12.0	68.55	
WAJY.C CP 274A	New Ellenton	SC	80.55	208.7	12.0	68.55	
WLPG LIC 219C2	Florence	SC	127.46	90.7	56.0	71.46	
WESCFM LIC 223C	Greenville	SC	168.21	311.2	96.0	72.21	

BRECKENRIDGE COMMUNICATIONS, L.L.C.

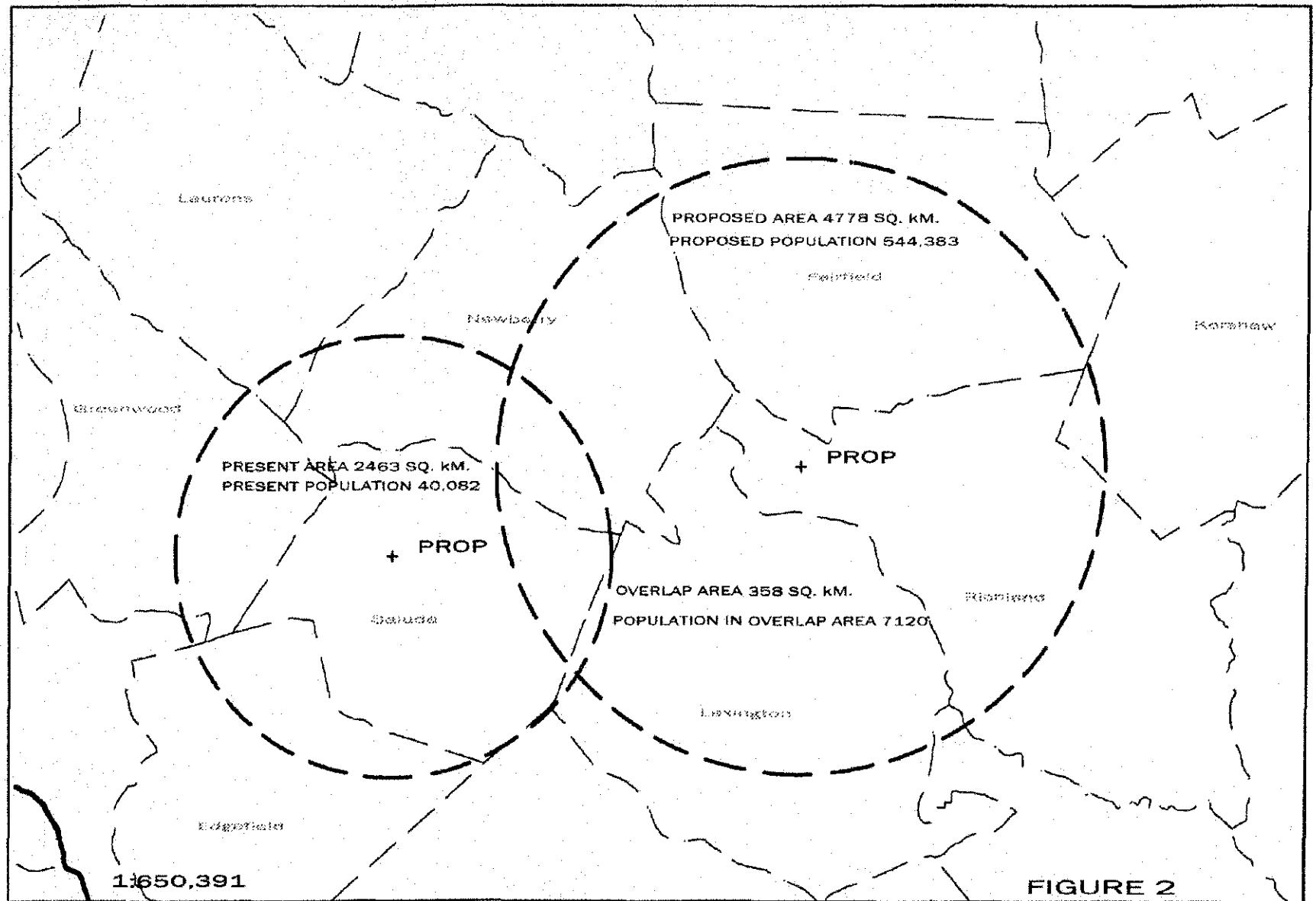
IRMO, SOUTH CAROLINA

IDENTIFICATION OF STATIONS SHOWN ON FIGURE 1

WKSX-FM	CH 224A	JOHNSTON, SC
WZLA-FM	CH 225A	ABBEVILLE, SC
WZMJ	CH 226A	BATESBURG, SC
WCRS-FM	CH 231A	CROSS HILL, SC
WKSP	CH 242C2	AIKEN, SC
WCOS-FM	CH 248C1	COLUMBIA, SC
WLXC	CH 253A	LEXINGTON, SC
WKXC-FM	CH 258C2	AIKEN, SC
WSSL-FM	CH 263C	GRAY COURT, SC
WROQ	CH 266C	ANDERSON, SC
WWDN	CH 267C	SUMTER, SC
WZSN	CH 278C3	GREENWOOD, SC
WBBQ-FM	CH 282C	AUGUSTA, GA
WNOK	CH 284C	COLUMBIA, SC
WZNY	CH 289C	AUGUSTA, GA
WGVC	CH 292C3	NEWBERRY, SC
WTCB	CH 294C1	ORANGEBURG, SC
WJMZ-FM	CH 297C	ANDERSON, SC
WPRW-FM	CH 299C2	MARTINEZ, GA



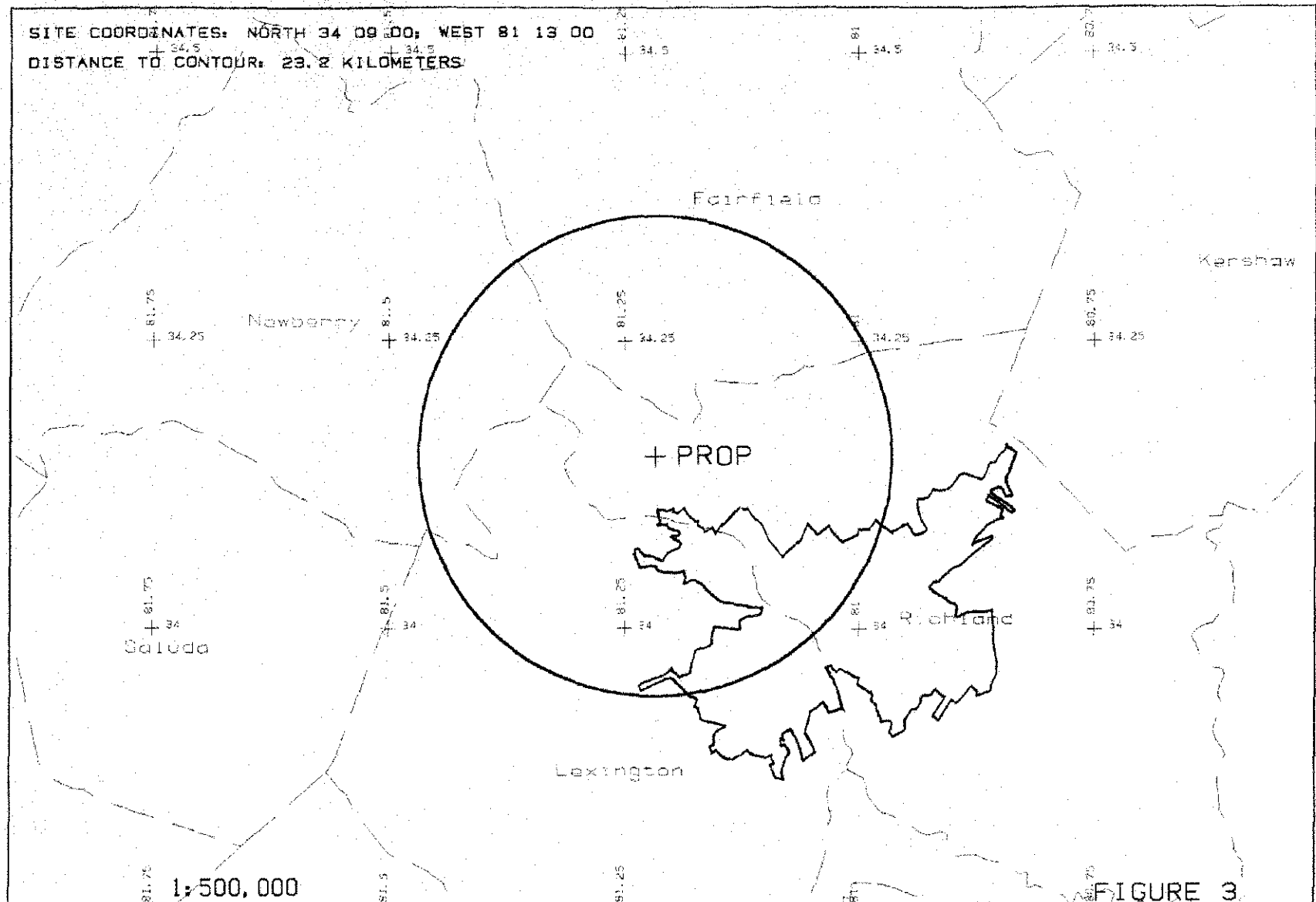
BRECKENRIDGE COMMUNICATIONS	EXISTING FM SERVICES INSIDE PRESENT WJES 60 dBu CONTOUR	
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PRESENT AND PROPOSED WJES 60 dBu
CONTOURS, AREAS AND POPULATIONS

BRECKENRIDGE
COMMUNICATIONS

SITE COORDINATES: NORTH 34 09 00; WEST 81 13 00
 DISTANCE TO CONTOUR: 23.2 KILOMETERS



<p>Scale in km</p> <p>0 10 20 30 40</p>	<p>THE PROPOSED WJES 70 dBu CONTOUR AND THE COLUMBIA, SC URBANIZED AREA</p>	<p>FIGURE 3 BRECKENRIDGE COMMUNICATIONS</p>
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